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2/8/17

California Department of Education School Siting Criteria comments

-Consider CHPS Criteria for Design or USGBC guidance.

Article II School Sites

14010

d. Rail Hazards- LAUSD is still siting schools in and around former railyards. They are likely doing more than any other school district yet it is still not accomplishing the intended goal.

14011 Procedures for Site Acquisition State-Funded School Districts

d. "Prepare maps showing present and proposed school sites" What is SFPD 4.02. This mentions significant roadways and hazardous installations. What about including tools or resources to define and identify hazardous installations.

e/f. Joint use of the grounds and buildings.... This is good. I am glad that there is a requirement for school district to collaborate with local planning agencies. Maybe we can expand this to include some of EPA's Smart Growth resources. Encouraging schools to be used as community hubs.

-What about using schools as an emergency shelter during natural disasters? This was included in the 2005 ESIA.

g. Education Code sections 17212

-subsection 2 mentions studies for many items. This may be a good place to include information on high risk facilities. "Traffic Hazards" is vague, we could improve this definition. Georgia has very strict guidelines for School Siting.

<http://www.astho.org/Programs/Health-in-All-Policies/Environmental-Health-in-All-Policies/Environmental-Health-in-All-Policies-Case-Study-Georgia-School-Siting/>

IN 2006 EPA funded RI to create a framework for avoiding high risk facilities during school siting. RI surveyed existing laws in all 50 states to get ideas for their guidelines.

<http://www.nylpi.org/images/FE/chain234siteType8/site203/client/EJ%20-%20Not%20in%20My%20Schoolyard%20-%20Improving%20Site%20Selection%20Process.pdf>

-We should be looking at RMP facilities and leveraging the work of Community Right to Know Activists.

-Local fire chiefs can be a good source of information

-Chlorine Industry Pamphlet 74. Crude oil.

h. EIR. <http://law.onecle.com/california/education/17213.html>

-Is there language around requiring DTSC's evaluation through the School Cleanup Program?

- No mention of near roadway exposure. Could reference EPA's guidance document. Define "a major roadway as" AADT > 75K. Could also look at fleet mix data when available.

Article 4. Standards, Planning and Approval of School Facilities

14030 Standards for Development of Plans for the Design and Construction of School Facilities.

b. Site Layout

- Could add language about vehicle idling. Including anti-idling signs or having an anti-idling policy.
- Specify that air intake vents should be away from garbage collection areas/dumpsters, parking lots, pick up and drop off points, and school bus waiting zones.

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d. Delivery and Utility Areas

- Subsection two. Could include that trash pickup be located away from air intake vents.
- Is there any way to encourage onsite composting when available? Or are these types of improvements not appropriate for regulations and be better suited for existing voluntary guidance and incentive programs such as the Green Ribbons School program?

e. future expansions

- Any way to include DTSC reviews of soil/land that would be included in an expansion, but was not apart of the initial Phase I screening that took place. Ex. Hoop Valley HS expansion onto soil contaminated with lead. Currently used as an overflow parking lot.

i. Laboratories shall be designed in accordance with the planned curriculum

- Again this may be an area where CDE could require schools to
- Subsection B references the "Science Facilities Design for CA Public Schools and "Science Safety Handbook". These are from 1993 and 1999, respectively. Would it be appropriate to include EPA's voluntary guidance documents on the school chemical management? Could there be a requirement for schools to develop chemical management plan? Would this overlap with existing CUPA regulations on chemical management and disposal?

l. Lighting- Could you encourage the use of natural lighting. Anyway to incorporate language from the Green Ribbons program? Examples could be taken from CHPS criteria for California.

- PCB's have been phased out of FLB's.
- Take

m. Acoustical- Is there any reasons the 45 decibel threshold is not explicitly used?

n. Plumbing

- Is there any need to discuss lead in pipes? Raising awareness about lead free solder and flux. Lead in brass fixtures?

What's not addressed in the regulations:

- Siting near hazardous facilities. Characterized as a facility that is at risk of explosion or release of hazardous air pollutants.

<https://ehp.niehs.nih.gov/ehp132/>

- There are so many ways for schools to get an exemption, almost reads like "do this if you can, but if you can't don't worry about it"

- EPA's school siting tools

- Smart growth and building schools to be community hubs.

- Low VOC paints

- Flame retardants and PBDEs.

Conversation with CDE Staff 2/8/17

- Best practice documents that are continually updated would be appropriate to include in the regulations.

- Send revised notes with corrections and links to sources.

- Cannot address operational issues in the regulations, however, oftentimes good design guidelines can preempt the need for operational regulations. Example: we can require that all chem labs have a lockable storage room vs. mandating a certain type of chemical inventory system.

Conservation with Robina Suwol, California Safe Schools 2/16/17

- Robina is requesting a copy of the comments submitted by EPA to CDE.

- Ongoing concerns about school siting statewide, with an emphasis on SoCal problems

- Paramount, Carlton Forge school faced scrutiny over high incidences of pediatric and rare cancers. High levels of Nickel and Hexavalent Chromium were found in school soils.

- Boys and Girls Club facility next to Jones Chemical company at SFD site. Concerned about accidental Chlorine release risk from the sites Chlorine repackaging center. Says that some releases have already occurred.